

**KIMBERLY C. TAVARES**  
**Attorney & Counselor at Law**

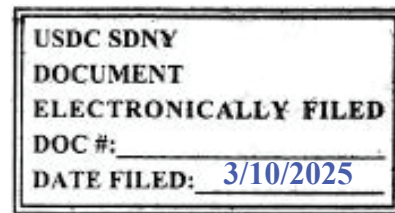
955 Coney Island Avenue, Suite 210  
Brooklyn, NY 11230  
Office: 917.300.8435  
Fax: 718.310.3183  
E-mail: [kcoleman.tavares@gmail.com](mailto:kcoleman.tavares@gmail.com)

PLAINTIFF'S SECOND LETTER MOTION FOR AN EXTENSION TO FILE

March 3, 2025

By ECF

Hon. Judge H. Jennifer Rearden  
United States District Court  
Southern District Court of New York  
500 Pearl Street  
New York, NY 10007



**RE:** *M.K. et al. v New York City Department of Education*  
*1:24 CV-04900 (JHR)*

Dear Judge Rearden:

I write to respectfully request a second extension of the deadline for submitting the certified record in the above-referenced matter. Initially, this letter was rejected as a duplicate of my initial letter. However, this is not a duplicate of the first request.

On February 17, 2025, I submitted my first request for an extension due to extraordinary circumstances, which the Court graciously granted, extending the deadline to March 3, 2025. Prior to that, I requested the Certified Record from the State Review Office on February 12, 2025. Please find attached a copy of the automated confirmation email from the State Review Office acknowledging my request.

Since then, I have not received the Certified Record despite my diligent efforts to obtain it. I contacted the State Review Office by telephone on February 24, 2025, and again on February 26, 2025, to follow up on the status of my request. On both occasions, I was informed that my inquiry would be directed to the appropriate individual, and was assured that I would receive a response. Unfortunately, as of today, I have received no further communication beyond the initial acknowledgment of my request.

Given these circumstances, I respectfully request an extension of the deadline to submit the certified record. I am also requesting an extension of the deadline for the submission of the Summary Judgment Motion. I have conferred with opposing counsel Jordan Doll, who has graciously consented to this request. Specifically, I request that the deadline for the submission of the Certified Record be extended to March 14, 2025, and deadline for the Summary Judgment Motion be extended to April 14, 2025.

I sincerely appreciate the Court's time and consideration of this request. Should Your Honor require any additional information, I remain available at the Court's convenience.

Respectfully submitted

\_\_\_\_\_  
/s/

Kimberly C. Tavares  
Counsel for Plaintiffs


**Cc: All Counsel of record  
(via ECF)**

**Attachment**

Application GRANTED. Plaintiffs' deadline to submit the Certified Record is extended *nunc pro tunc* to **March 14, 2025**. Plaintiffs shall move for summary judgment by **April 14, 2025**. By **March 12, 2025**, the parties shall submit a joint letter informing the Court whether they seek a concomitant extension of the deadlines for (1) Defendant to file its cross-motion for summary judgment and opposition to Plaintiffs' motion; (2) Plaintiffs to submit their reply, if any, to Defendant's opposition and their opposition to Defendant's motion for summary judgment; and (3) Defendant to submit its reply, if any, to Plaintiffs' opposition. *See* ECF No. 19.

The Clerk of Court is directed to terminate ECF Nos. 22 and 24.

SO ORDERED.

  
Jennifer H. Rearden, U.S.D.J.  
Dated: March 10, 2025